

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

THE WOLK LAW FIRM, <i>et al.</i>	:	
	:	
v.	:	
	:	CIVIL ACTION NO. 2:14-cv-5184(CMR)
UNITED STATES OF AMERICA,	:	
NATIONAL TRANSPORTATION SAFETY	:	
BOARD	:	

**STIPULATION TO ENLARGE THE TIME FOR PLAINTIFFS’
RESPONSE TO THE NTSB’S MOTION TO DISMISS**

1. This matter arises from the investigations of several civil aircraft crashes by the United States of America, National Transportation Safety Board (“NTSB”).

2. Plaintiffs’ Complaint seeks injunctive relief with respect to the NTSB’s investigation of five separate aircraft crashes: the “Kelly/Jenny” matter, the “Haber” matter, the “Mow” matter, the “Gamble” matter and the “N110EB” matter. (Doc. 1).

3. Pursuant to the Parties stipulation, on October 27, 2014 the Court entered an Order holding this matter in abeyance while the parties negotiated amicable resolutions to Plaintiffs’ claims. (Doc. 6).

4. The Parties stipulated, and the Court ordered, that at the conclusion of the 30-day abeyance period Plaintiffs would have 14 days to either withdraw individual Plaintiffs, respond to the NTSB’s Motion to Dismiss or enter into an additional stipulation with the NTSB. (Doc. 6.)

5. On December 9, 2014 Plaintiffs filed three stipulated dismissals of the “Kelly/Jenny” and “Mow” Plaintiffs pursuant to Rule 41(a)(1)(A)(ii) because their claims have been amicably resolved. (Docs. 7, 8, 9).

6. The “Gamble” Plaintiffs, the “Haber” Plaintiffs and “N110EB” Plaintiffs have claims remaining against the NTSB. (Doc. 1).

7. Plaintiffs’ response to the NTSB’s Motion to Dismiss is due December 10, 2014. (Doc. 6).

8. The NTSB and the remaining Plaintiffs are continuing to work towards amicable resolutions of the remaining claims which may be accomplished in the next 14 days.

IT IS THEREFORE STIPULATED AND AGREED that Plaintiffs are granted an additional fourteen (14) days to either withdraw individual Plaintiffs from this litigation upon the receipt of the materials sought from the NTSB; to respond to the NTSB’s Motion to Dismiss for the Plaintiff(s) remaining in the action (if any); or to enter into an additional stipulation with the NTSB.

IT IS SO STIPULATED THIS 10th day of December, 2014.

/s/ John J. Gagliano
John J. Gagliano, Esquire
THE WOLK LAW FIRM
1710-12 Locust Street
Philadelphia, PA 19103
(215) 545-4220
Fax: (215) 545-5252
jgagliano@airlaw.com
courtfilings@airlaw.com
Attorney for Plaintiffs

and

/s/ Stacey L.B. Smith
Stacey L.B. Smith, Esquire
Assistant United States Attorney
United States Attorney’s Office,
Eastern District of Pennsylvania
615 Chestnut Street, Suite 1250
Philadelphia, PA 19106
(215) 861-8348
Fax: (215) 861-8618
Stacey.Smith@usdoj.gov

IT IS SO ORDERED BY THE COURT this _____ day of December , 2014.

HONORABLE CYNTHIA M. RUFÉ
Judge, United States District Court